

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION, INC.,

Plaintiff,

v.

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY,

Defendants.

Case No. 1:16-cv-11950-MLW

JOINT STATUS REPORT

Pursuant to the Court’s October 26, 2022 order (ECF No. 149), Plaintiff Conservation Law Foundation (“CLF”) and Defendants Exxon Mobil Corporation, ExxonMobil Oil Corporation, and ExxonMobil Pipeline Company (collectively, “ExxonMobil”) respectfully submit the following Joint Status Report.

As instructed by the Court, following the October 26, 2022 conference, the parties have pursued settlement discussions. The parties had an initial teleconference on November 3, and a second call on November 16. On November 22, CLF sent ExxonMobil a proposed settlement term sheet, which ExxonMobil is reviewing.

The parties are hopeful that progress can be made with additional discussion and negotiation. Provided the Court agrees, the parties propose that, by January 18, 2023, the parties report to the Court again regarding the status of their discussions and, if no settlement has been reached, whether they request additional time; would like to pursue mediation; or want to litigate whether any of the claims in this case are moot and, if so, their position on the discovery sought

by CLF concerning a potential motion to dismiss on mootness grounds, per the Court's October 26, 2022 order.

DATED: December 1, 2022

CONSERVATION LAW FOUNDATION,
INC.,

By its attorneys,

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Respectfully submitted,

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY,

By their attorneys,

By: /s/ Daniel J. Toal
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CERTIFICATE OF SERVICE

I, Daniel J. Toal, hereby certify that, in accordance with Local Rule 5.2(b), the foregoing document was filed through the ECF system on December 1, 2022, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Daniel J. Toal

Daniel J. Toal